

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
ZACHARY T. WEBER	:	
Debtor,	:	
	:	
v.	:	
	:	Bankruptcy No. 1:18-bk-01378-HWV
NATIONSTAR MORTGAGE LLC	:	
d/b/a MR. COOPER	:	
Movant,	:	
	:	
ZACHARY T. WEBER	:	
JESSICA F. WEBER	:	
CHARLES J. DEHART, JR	:	
Respondents.	:	

**DEBTOR'S ANSWER TO MOVANT'S MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW COMES, Debtor, Zachary T. Weber, by and through his attorneys, Jacobson, Julius & Harshberger, and hereby file this Answer to Movant's Motion for Relief from the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Paragraph 5 is a conclusion of law to which no response is required. To the extent a response is required, said averment is admitted.
6. Admitted.
7. Admitted.
8. It is admitted the Debtor is behind on payments to Movant. Debtor hopes that Movant will allow him to cure the arrears via an amended plan or a stipulation.

9. It is admitted the Debtor is behind on payments to Movant. Debtor hopes that Movant will allow him to cure the arrears via an amended plan or a stipulation.

10. Admitted.

11. Paragraph 11 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

12. Paragraph 12 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

13. Admitted.

14. Paragraph 14 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

WHEREFORE, Debtor respectfully requests that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay and further requests any other relief deemed necessary and just.

Respectfully Submitted,

JACOBSON, JULIUS, & HARSHBERGER

Dated: October 18, 2019

s/Chad J. Julius

ID# 209496

8150 Derry Street

Harrisburg, PA 17111.5260

717.909.5858

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CERTIFICATE OF SERVICE

I, Colleen Reed, of Jacobson, Julius & Harshberger, do hereby certify that on this day I served the within Respondent's Answer to Movant's Motion For Relief From The Automatic Stay upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

ECF/CM:

Charles J. Dehart III, Esquire (Trustee) 8125 Adams Drive, Suite A Hummelstown, PA 17036	Kevin S. Frankel, Esquire Shapiro & DeNardo, LLC 3600 Horizon Drive, Suite 150 King of Prussia
United States Bankruptcy Court Ronald Reagan Federal Building 228 Walnut Street, Room 320 Harrisburg, PA 17108	

s/ Colleen Reed

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Dated: October 18, 2019